

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 2001

Docket No. R2001-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
SECOND SET OF INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS LINDA A. KINGSLEY
(NAA/USPS-T39-6-12)
November 26, 2001**

The Newspaper Association of America hereby submits the attached
interrogatories to United States Postal Service witness Linda A. Kingsley (USPS-T-39)
and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all
participants requesting such service in this proceeding in accordance with section 12 of
the Rules of Practice.

November 26, 2001

William B. Baker
William B. Baker

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NAA/USPS-T39-6: Please refer to Page 28, lines 7 to 9, of your testimony. On the routes with a large proportion of centralized delivery that use a horizontal flats case, how many in-office handlings of flats are typically required?

NAA/USPS-T39-7: Please describe the physical dimensions, layout, and capacity of vertical flats cases.

NAA/USPS-T39-8: How many separations do vertical flats cases contain?

NAA/USPS-T39-9: How many separations do horizontal flats cases contain?

NAA/USPS-T39-10: How many addresses are served by each separation in a vertical flats case?

NAA/USPS-T39-11: How many addresses are served by each separation in In a horizontal flats case?

NAA/USPS-T39-12: Please provide the best information available regarding the average or typical number of delivery points on:

- a. Park and loop routes
- b. Curblin routes